## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	) Chapter 11
TEHUM CARE SERVICES, INC.,1	) Case No. 23-90086 (CML)
Debtor.	)
	)

# **DEBTOR'S WITNESS AND EXHIBIT LIST FOR MARCH 3, 2023 HEARING**

The above-captioned debtor and debtor in possession (the "<u>Debtor</u>") files this Witness and Exhibit List for the hearing to be held on March 3, 2023, at 1:00 p.m. (prevailing Central Time) on the *Debtor's Emergency Motion to Extend and Enforce the Automatic Stay* [Docket No. 7] (the "<u>Hearing</u>").

#### **Witnesses**

- 1. Russell A. Perry, Chief Restructuring Officer of Tehum Care Services, Inc.;
- 2. Any witness called or listed by any other party in interest; and
- 3. Impeachment witnesses, as necessary.

## **Exhibits**

Ex. No.	Description
1.	Declaration of Russell A. Perry in Support of Debtor's Emergency Motion to Extend and Enforce the Automatic Stay [Docket No. 7 at 21]
2.	Notice of Hearing regarding Debtor's Emergency Motion to Extend and Enforce the Automatic Stay [Docket No. 11]
3.	Supplemental Certificate of Service regarding Debtor's Emergency Motion to Extend Stay [Docket No. 8]
4.	Second Supplemental Certificate of Service regarding Debtor's Emergency Motion to Extend Stay [Docket No. 26]

<sup>&</sup>lt;sup>1</sup> The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

Ex. No.	Description
5.	Third Supplemental Certificate of Service regarding Debtor's Emergency Motion to Extend Stay and the Notice of Hearing on Same[Docket No. 27]
6.	Certificate of Service re: Notice of Revised Proposed Order [Docket No. 43]
7.	Second Amended and Restated By-Laws of Corizon Health, Inc., adopted June 26, 2020 (Delaware)
8.	Bylaws of Corizon Health, Inc. (Texas)
9.	Unanimous Written Consent of the Board of Directors and the Stockholders of Valitas Intermediate Holdings, Inc. Valitas Health Services, Inc., Corizon Health, Inc., dated September 1, 2020
10.	Unanimous Written Consent of the Board of Directors of Corizon Health, Inc., dated May 1, 2022
11.	Certificate of Records by Office of the Secretary of State, dated February 22, 2023
12.	Alabama Department of Corrections ("DOC") Agreement
13.	Excerpt of Arizona DOC Agreement
14.	Excerpt of Florida DOC Agreement
15.	Idaho DOC Agreement
16.	Kansas PA Agreement
17.	Michigan Genesee County Agreement
18.	Michigan – Dr. Schmidt Agreement
19.	Missouri – St. Louis Agreement
20.	Excerpt of Missouri DOC Agreement
21.	New Mexico - Doña Ana County Agreement
22.	New York City Agreement
23.	New York City PC Agreement
24.	Oregon Clackamas County Agreement
26.	Any document or pleading filed with the Court in the above-captioned cases.
27.	Any exhibit necessary for impeachment purposes.
28.	Any exhibit identified or offered by any other party.

### **Reservation of Rights**

The Debtor reserves the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserves the right to supplement or otherwise amend this Witness and Exhibit List prior to the Hearing.

Respectfully submitted this 1st day of March, 2023.

#### **GRAY REED**

By: /s/ Jason S. Brookner

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Proposed Counsel to the Debtor and Debtor in Possession

#### **Certificate of Service**

I certify that on March 1, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jason S. Brookner

Jason S. Brookner